



## CA DOJ – Hot Topics

**2025 Firearm Industry  
Compliance Webinar Series**



# Additional Educational Resources



## Industry Compliance Courses & More!

- Firearm E-Commerce Blueprint
- Unlocking Success in the NFA Space
- Winning at ATF Inspections
- Completing the Form 4473
- Multiple Sales Report

**[NSSF.org/Education](https://www.nssf.org/Education)**

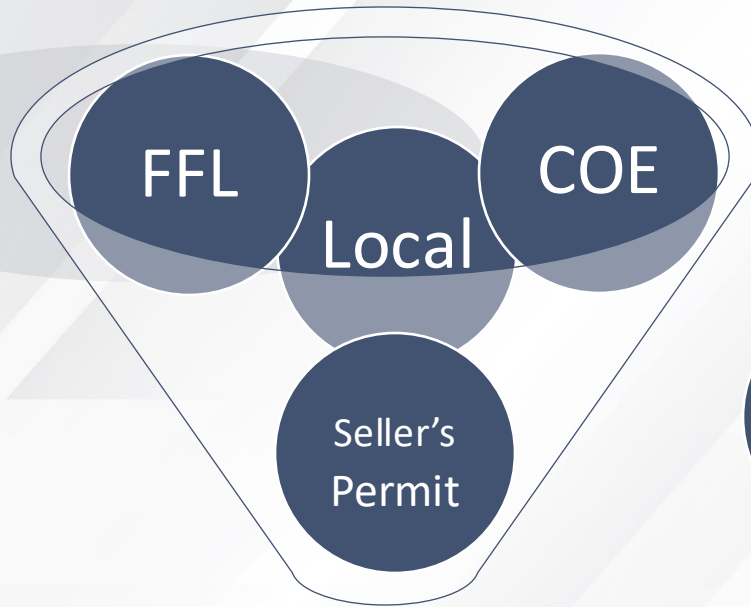


# Itinerary



- Licensing
- Security
- New Legislation
- Top Inspection Findings
- DROS Updates and Reminders
- Storage
- Questions

# Licensing Requirements



Centralized List

All licenses must be posted



Optional Permit  
Required when  
buy, pawn,  
trade, or  
consign to/from  
a private party

# Licensing Requirements - continued

## Centralized Lists

CL

CLEFFL

CLM

## Certificate Of Eligibility

Responsible parties (on FFL)

Note: You must add the additional names to your CFD account. It is not automatic

# Licensing Requirements - continued

---

## Manufacture Licensing

- California considers assembling firearms as manufacturing
- Assemble/build 4 or more serialized pieces (lower or completed firearm) in a year, you are required to be on Centralized List of Manufacturers (CLM) in addition to regular CL and FFL 07

# Security Requirements

Any time when the licensee is not open for business; all firearms shall be secured using one of the following methods as to each particular firearm:



Store the firearm in a secure facility that is a part of, or that constitutes, the licensee's business premises.



Secure the firearm with a hardened steel rod or cable of at least one-eighth inch in diameter through the trigger guard of the firearm. The steel rod or cable shall be secured with a hardened steel lock that has a shackle. The lock and shackle shall be protected or shielded from the use of a bolt cutter and the rod or cable shall be anchored in a manner that prevents the removal of the firearm from the premises.



Store the firearm in a locked fireproof safe or vault in the licensee's business premises.

# Security Requirements continued

## Doors

- 1) Windowless steel security door equipped with **both a deadbolt and a doorknob lock**
- 2) Windowed metal door equipped with both a deadbolt and a doorknob lock and window covered with steel bars or at least one-half inch diameter or metal grating of at least nine gauge affixed to the door

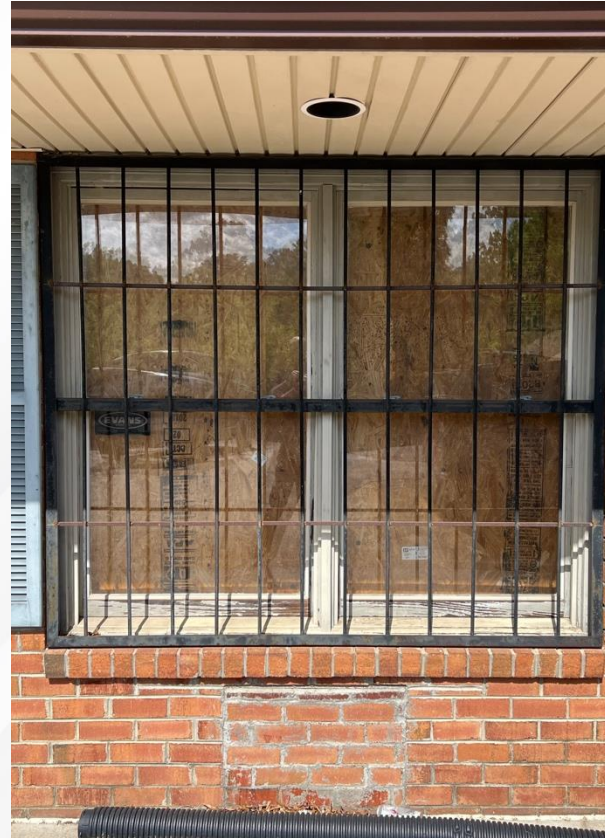




# Security Requirements continued

## Windows

All exterior windows and/or skylights must be secured with steel window guards, or metal bars with **openings not to exceed five inches when measured in any direction**



# Security Requirements continued



## Metal Grates/Bars

All exterior windows and/or skylights must be secured with steel window guards, or metal bars with **openings not to exceed five inches when measured in any direction**

# Security Requirements continued

## California PC 26806

(a) Commencing January 1, 2024, a licensee shall ensure that its business premises are monitored by a digital video surveillance system that meets all of the following requirements:

1. The system shall clearly record images and, for systems located inside the premises, audio of the area under surveillance.
2. Each camera shall be permanently mounted in a fixed location. Cameras shall be placed in locations that allow the camera to clearly record activity occurring in all areas described in paragraph (3) and reasonably produce recordings that allow for the clear identification of any person.
3. The areas recorded shall include, without limitation, all of the following:
  - a) Interior views of all entries or exits to the premises.
  - b) All areas where firearms are displayed.
  - c) All points of sale, sufficient to identify the parties involved in the transaction.
4. The system shall continuously record 24 hours per day at a frame rate no less than 15 frames per second.
5. The media or device on which recordings are stored shall be secured in a manner to protect the recording from tampering, unauthorized access or use, or theft.
6. Recordings shall be maintained for a minimum of one year.
7. Recorded images shall clearly and accurately display the date and time.
8. The system shall be equipped with a failure notification system that provides notification to the licensee of any interruption or failure of the system or storage device.



**Note:** California DOJ is not enforcing these new requirements pending a current lawsuit

# Security Requirements continued

Anyone with access to  
firearms and/or ammunition  
must have a valid COE.

PC 26700, PC 26915, PC 30347

Note: Including bookkeeper,  
owner's children, spouses,  
friends helping out, etc.



# New Legislation

## Firearm Safety Certificate (FSC) changes:

- Pursuant to Penal Codes 34210 and 26866, firearm dealers are required to distribute the Firearm Safety and Risk of Firearm Ownership pamphlet to the purchaser/transferee of a firearm at the start of the waiting period
- FSC Safety Study Guide, Tests (all), Answer Sheet and Answer Key have all changed
- There is no Spanish Version available at this time
  - [FSC Manual, PDF](#) (revised June 2025)
  - [FSC Study Guide, PDF](#) (revised June 2025)
  - [Firearms Safety and the Risk of Owning A Firearm Pamphlet, PDF](#)



# Top Violations

## Firearm Safety Device (FSD)/lock missing or not documented:

- **OEM** – Firearm comes with approved lock

Document lock make and model in comment field of DROS

- **Receipt** – Customer purchased lock within the past 30 days (from you or somewhere else) – Maintain receipt with DROS
- **Safe Affidavit** – Ensure the affidavit is complete and maintain with DROS




# Top Violations continued

---

Exemption document no photocopy of the reverse side (LEO ID, CCW, Hunting License, etc.)

Invalid/missing hunting license for underage purchaser of non-semi-auto long gun

Required licenses not posted (FFL, COE, Local, Seller's Permit)

 Did you know? – There are a minimum of 40 requirements on a typical DROS application.

# DROS Updates & Reminders

---

## A&D Firearm Disposition

Remember: The only disposition options available for a firearm logged into you're A&D Book are:

- Dealer to Dealer
- Dealer to Law Enforcement Agency
- DROS
- Gunsmith Return (with no change of firearm and/or serial number)



# DROS Updates & Reminders

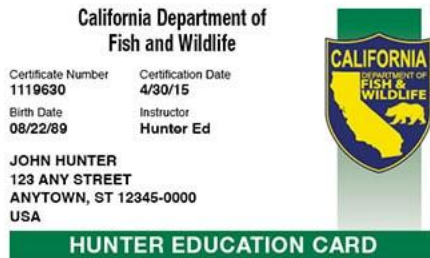
## ➔ Violation Fees for non-compliance – Coming soon

- Level 1: \$100 per violation  
Example: Fees and licenses not posted
- Level 2: \$500 per violation  
Example: Missing DROS supporting documents
- Level 3: \$1,000 per violation  
Example: Employee w/o COE, Security, Missing exemption documents
- Level 4: \$1,000 - \$3,000 per violation  
Example: Fraudulent licenses or documents, Falsification of DROS, Possession of AW w/o DWP

# DROS Updates & Reminders

## Immigrant Sales

- Print valid I-94 from U.S. Immigration and Customs Enforcement (ICE) website
- Retain valid (@ time of delivery) Hunting License
- Hunting License is FSC exemption for long gun, but not for handgun purchase



# DROS Updates & Reminders

## DROS Transaction Types

Exempt handgun DROS when firearm is exempt:

- Single action
- Single shot exemption

Exempt handgun DROS when purchaser is exempt: LEO

Exempt handgun DROS when transaction is exempt: (Does not include PPT)

- Operation of Law
- Intrafamilial Transfer

C&R – use the C&R handgun or long gun DROS

# Storage - Prohibited Storage

---

## Acquired from LEA:

- Log into A&D Book - Example: acquisition: XPD (owner name)
- Enter in DES as “storage”
- If purchased for inventory, complete FDAR in DES and hold 30 days
- When prohibition is over, firearm(s) must be DROSeD back to the owner, using the Temporary Storage Return option, or PPT to someone else as applicable

# Storage - Prohibited Storage

## Acquired from individual:

- Prohibition must have an end date
- Enter in DES as storage
- Complete court paperwork if applicable and give to the prohibited individual to return to court
- When prohibition is over, firearm(s) must be DROSeD back to the owner, using the Temporary Storage Return option, or PPT to someone else as applicable
- If purchased for inventory, complete FDAR in DES and hold 30 days



## NSSF Member Benefits for Retailers & Ranges

- Compliance Hotline
- SHOT University Online
- Discounts to Live Events including SHOT Show (first buyer badge is free - additional registrations discounted)
- Member Benefit Provider Discounts
- Access to Programs Such as First Shots

**Join Today!**

## NSSF Compliance Team

### ATF Consultants



**Judy Bender**  
judybender73@gmail.com  
630-418-0141



**John "JB" Bocker**  
jb@fflconsultants.com  
720-336-0028



**Harry McCabe**  
harry@mccabeconsultingllc.com  
931-505-3638



**Andrew Graham**  
andy@grahamia.com  
720-670-0096



**Bill Napier**  
lpcbill@gmail.com  
308-249-0131



**Wally Nelson**  
nels4947@outlook.com  
703-505-2617



**Judyth Ledoux**  
ledoux.judyth@gmail.com  
202-528-9465

### ATF & OSHA Consultant



**John "JC" Clark**  
jc@fflconsultants.com  
720-431-8821

### CA DOJ Consultant



**Renee Lewis**  
rlewis.consultant@gmail.com  
916-717-5304

### OSHA Consultant



**Dale Krupinski**  
oshacoach@ontargetsafetyacademy.com  
303-351-7915

### Federal Excise Tax Consultant



**Richard M. Weimer**  
akrich246@yahoo.com  
704-641-0531

## Meet The Team



**BUY A GUN  
FOR SOMEONE  
WHO CAN'T  
BUY 15 YEARS IN JAIL**



**DontLie.Org**

Don't Lie Kit's Available at DontLie.org



**DON'T LIE  
FOR THE OTHER GUY**

**BUY A GUN  
FOR SOMEONE  
WHO CAN'T  
BUY 15 YEARS IN JAIL**

**DON'T LIE  
FOR THE OTHER GUY**

**RETAILERS GUIDE  
TO RECOGNIZING  
AND DETERRING  
STRAW PURCHASES**

**DON'T LIE  
FOR THE OTHER GUY**

**NSSF**  
The Firearm Industry  
Trade Association

**A COOPERATIVE PROGRAM OF**

ANY  
QUESTIONS





# Renee Lewis

[rlewis.consultant@gmail.com](mailto:rlewis.consultant@gmail.com)

916-717-5304

